

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352
FEB 01 2001

01-RCA-126

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

Dear Mr. Wilson:

REQUEST TO DENY CLOSURE OF THE 2401-W WASTE STORAGE BUILDING (2401-W)

- References: (1) Ecology ltr. to J. E. Rasmussen, RL, from T. Wooley, dtd. October 18, 1999.
- (2) RL ltr. to R. J. Julian, Ecology, from J. E. Rasmussen, "Transmittal of the 2401-W Waste Storage Building Closure Plan," 99-EAP-403, dtd. July 29, 1999.
- (3) RL ltr. to L. J. Cusack, Ecology, from J. E. Rasmussen, "Notification of Intent to Close the 2401-W Waste Storage Building," 98-EAP-475, dtd. August 28, 1998.

This letter withdraws prior U.S. Department of Energy, Richland Operations Office (RL) notification to the State of Washington Department of Ecology (Ecology) of its intent to close 2401-W as a Resource Conservation and Recovery Act (RCRA) treatment, storage, and/or disposal (TSD) unit. This letter further requests that Ecology deny approval of the "2401-W Closure Plan."

2401-W is a portion of the Central Waste Complex (CWC) RCRA TSD unit. Until 1998, 2401-W was used to store containerized dangerous and/or mixed waste. In 1998, RL notified Ecology of its intent to close this building as a RCRA TSD unit in order to use it for non-TSD operations [Reference (3)]. With Ecology concurrence and with Ecology present, 2401-W closure activities began and were completed in February 1999 in accordance with the as-yet-unapproved Chapter 11.0 of the "Hanford Dangerous Waste Permit Application, Central Waste Complex" (DOE/RL-91-17, Rev. 1). The 2401-W physical closure activities were limited to minor cleaning and inspections.

At Ecology's request, documentation of completed closure activities was incorporated into the "2401-W Closure Plan" (DOE/RL-99-46, Rev. 0). It was submitted to Ecology in July 1999 for approval by inclusion into the Hanford Facility RCRA Permit (HF RCRA Permit) during Modification E [Reference (2)]. Ecology indicated that this closure plan would have only conditional Ecology approval until it underwent public review and was incorporated into the HF RCRA Permit [Reference (1)]. Because the "2401-W Closure Plan" has not yet been incorporated into the HF RCRA Permit, it is not yet formally approved.

Mr. Michael A. Wilson
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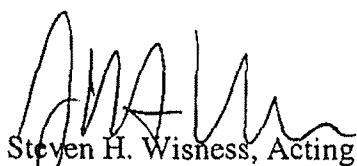
Since completing closure activities, the non-TSD unit operations planned for 2401-W that initiated the need for RCRA closure are no longer planned to occur at 2401-W. To enhance operational efficiency and secure significant cost savings, RL and Fluor Hanford, Inc., Waste Management Project, now desire to resume TSD unit operations at 2401-W. Possible 2401-W TSD unit activities now under consideration include waste sampling and characterization, a consolidated waste receipt facility, and a site for managing 'transient' waste containers prior to their storage, disposal, or shipment to an offsite TSD. Resumption of 2401-W TSD operations will best utilize the recent \$350,000 investment in 2401-W infrastructure improvements, and will gain annual cost savings in excess of \$50,000 through more efficient Waste Receiving and Packaging (WRAP) and Solid Waste Treatment Plant (T Plant) operations.

To enable resumption of 2401-W TSD activities, RL is herein withdrawing its prior notification of intent to close 2401-W. Although the "2401-W Closure Plan" is not yet formally approved, because it has already undergone public review, RL is requesting that Ecology deny closure plan approval. Because 2401-W physical closure activities did not impact the building's ability to function as a TSD unit, the Ecology response is requested to allow immediate resumption of TSD operations.

Your immediate attention to this request is important to ensure that approval of the "2401-W Closure Plan" is denied before closure plan inclusion into the HF RCRA Permit completes formal closure of 2401-W as a RCRA TSD unit. RL understands that, due to the timing of issuance of Modification E, Ecology has concerns with being able to support this request. If denial of closure is not possible, an alternative regulatory pathway to incorporate 2401-W back into the CWC TSD boundary is necessary. RL is ready to discuss these options with your staff.

If you have questions or need further clarification on this matter, please contact Astrid Larsen, of my staff, at (509) 372-0477, or Greg L. Sinton, Waste Management Division, at (509) 373-7939.

Sincerely,


Steven H. Wisness, Acting Director
Regulatory Compliance and Analysis Division

RCA:APL

cc: Ecology Library, Kennewick
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